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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

Pacific Information Resources, Inc., a  
 California Corporation,

Plaintiff,

vs.

SIMPLE COMMUNICATIONS, an Alabama  
 corporation; WILLIAM TRAVIS SULLIVAN,  
 individually, AND DOES 1 through 100,  
 inclusive, WHOSE IDENTITIES ARE  
 UNKNOWN,

Defendants.

**CASE NO. CV-07-4131 MMC**

**[Before the Honorable Maxine M.  
 Chesney, Courtroom 7]**

**PLAINTIFF'S RESPONSE TO OSC RE:  
 DEFAULT JUDGMENT AND REQUEST  
 TO CONTINUE DATE FOR FILING  
 MOTION FOR DEFAULT JUDGMENT  
 AGAINST WILLIAM TRAVIS  
 SULLIVAN AND SIMPLE  
 COMMUNICATIONS; ORDER THEREON**

Complaint Filed: August 9, 2007  
 Discovery Cut-Off: N/A  
 Trial: N/A  
 Status Conference: February 1, 2008

**TO THIS HONORABLE COURT AND ALL PARTIES AND THEIR  
 ATTORNEYS OF RECORD HEREIN:**

Plaintiff Pacific Information Resources, Inc. ("Plaintiff") hereby requests a continuance  
 of the Court to file its Default Judgment Application on February 1, 2008 instead of on  
 December 21, 2008. Plaintiff makes this request on the basis of good cause in that extrapolating

the voluminous data necessary to support the Default Judgement which will be in excess of \$3 million has taken more time than anticipated.

Moreover, in order to satisfy the stringent requirements for obtaining the Default Judgment, additional documentation and discovery by Plaintiff has been required. Indeed, one of Plaintiff's experts, Professor Ran Hadas, is teaching and researching at the University of Melbourne in Australia until June, 2008. Thus, coordinating with Professor Hadas has been a time consuming logistical challenge.

Plaintiff apologizes to the Court for this belated request.

There will be no prejudice to any party who has direct or related interest in this case, including those parties who are Defendants in the related case noted herein.

Plaintiff humbly request this extension in order to properly comply with all statutory and local criteria for granting the Default Judgment Application.

Respectfully submitted,

DATED: January 10, 2008

**NOVO LAW GROUP, P.C.**

BY: /s/Konrad L. Trope, Esq.  
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INC.

**~~[PROPOSED]~~ ORDER**

Plaintiff Pacific Information Resources has hereby requested continuance to file its Default Judgment Application against Defendants William Travis Sullivan and Simple Communications to February 1, 2008.

1 Having considered the requested extension, good cause appearing, therefore, and no  
2 prejudice any parties appearing, IT IS HEREBY ORDERED that:

3 Plaintiff shall file its Application for Default Judgment not later than February 1, 2008.

4 Dated: January 11, 2008

  
Honorable MAXINE M. CHESNEY  
United States District Judge